

EXHIBIT A

**BEFORE THE
UNITED STATES JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

**IN RE: INCLUSIVE ACCESS COURSE
MATERIALS ANTITRUST LITIGATION**

MDL No. 2946

NOTICE OF RELATED ACTION

Pursuant to Rule 6.2(d) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, the undersigned counsel hereby notifies the Panel of the following related action that was filed on June 3, 2020, and after the initial motion to transfer in this case:

Caption: *Donovan McGee, et al. v. Barnes & Noble College Booksellers, LLC, et al.*

Court: United States District Court for the District of New Jersey

Case No.: 3:20-cv-06783

Judge: Unassigned.

A Schedule of Additional Action is attached as Exhibit 1. Copies of the current docket sheet, complaint, and civil cover sheet in the *McGee* action are attached as Exhibit 2. The *McGee* action involves substantially the same factual allegations and claims as those pending before the Panel in the above-captioned proceeding.

The *McGee* action has been marked as related to *Barabas, et al. v. Barnes & Noble College Booksellers, LLC, et al.*, No. 3:20-cv-02442-FLW-TJB, which Defendants identified in their initial Schedule of Actions. Chief Judge Freda L. Wolfson is currently presiding over the *Barabas* action and seven other related actions, all of which are subject to these proceedings. As of the time of this filing, the *McGee* action is unassigned to a judge.

Dated: June 4, 2020

Respectfully Submitted,

/s/ William F. Cavanaugh
William F. Cavanaugh, Jr.
Saul B. Shapiro
Amy N. Vegari
PATTERSON BELKNAP WEBB &
TYLER LLP
1133 Avenue of the Americas
New York, New York 10036
Tel: (212) 336-2000
Fax: (212) 336-2222
wfcavanaugh@pbwt.com
sbshapiro@pbwt.com
avegari@pbwt.com

Counsel for Defendant McGraw Hill LLC

/s/ Eric Mahr
Eric Mahr
Andrew J. Ewalt
Richard Snyder
FRESHFIELDS BRUCKHAUS
DERINGER US LLP
700 13th Street NW, 10th Floor
Washington, DC 20005-3960
Tel: (202) 777-4500
Fax: (202) 777-4555
eric.mahr@freshfields.com
andrew.ewalt@freshfields.com
richard.snyder@freshfields.com

Counsel for Defendant Cengage Learning, Inc.

/s/ Michael Dockterman
Michael Dockterman
STEPTOE & JOHNSON LLP
227 W. Monroe Street, Suite 4700
Chicago, Illinois 60606
Tel: (312) 577-1300
Fax: (312) 577-1370
mdockterman@steptoe.com

Jennifer Quinn-Barabanov
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue NW
Washington, DC 20036
Tel: (202) 429-3000
Fax: (202) 429-3902
jqinnba@steptoe.com

Counsel for Defendant Pearson Education, Inc.

/s/ Craig C. Martin
Craig C. Martin
Matt D. Basil
WILLKIE FARR & GALLAGHER LLP
300 North LaSalle Street
Chicago, Illinois 60654
Tel: (312) 728-9000
Fax: (312) 728-9199
cmartin@willkie.com
mbasil@willkie.com

Counsel for Defendant Follett Higher Education Group, Inc.

/s/ Rachel S. Brass

Rachel S. Brass
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, California 94105-0921
Tel: (415) 393-8293
Fax: (415) 374-8429
rbrass@gibsondunn.com

Adam J. Di Vincenzo
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel: (202) 887-3704
Fax: (202) 530-9615
adivincenzo@gibsondunn.com

*Counsel for Defendants Barnes & Noble
Education, Inc. and Barnes & Noble
College Booksellers, LLC*